

RE: Typo in interrogatory | Bush v. Fantasia et al

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On July 14, 2022 at 8:33:47 AM, John Davis (jdavis@piercedavis.com) wrote:

Mike,

I apologize for my delayed response. There should be no need to engage in motion practice. I am working on the discovery responses and should have them to you by the end of the month. Although it's not an excuse, an associate of mine resigned last month and I've been trying to dig out ever since my return from vacation. Thank you for your patience.

All the best,

John

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From: Mike Bush <bmoc54@verizon.net>
Sent: Wednesday, July 13, 2022 8:58 AM
To: John Davis <JDavis@piercedavis.com>
Cc: Barbara Fergusson <BFergusson@piercedavis.com>
Subject: RE: Typo in interrogatory | Bush v. Fantasia et al

Hi John,

I hope you're well.

As the defendants' answers to the first round of interrogatories are now quite overdue, I have not received a response from you to my attached letter dated June 22nd (which included requests for copies of documents),

and I have not received a response from you to my below follow up email message of June 24th, this message is my last ditch effort to resolve the issues. I would prefer to avoid taking up the court's time with a motion to compel when the fact that the defendants' answers to the first round of interrogatories are overdue is not in dispute between us.

In my email message of June 24th (below) I provided a correction to a typo in one of the interrogatories in the 2nd round of interrogatories served on June 22nd.

Kind Regards,
Mike Bush

On June 24, 2022 at 10:04:51 AM, Mike Bush (bmoc54@verizon.net) wrote:

Thanks for the update, Barbara. If John is on vacation for another couple of weeks, perhaps I should bring to your awareness that much of what I communicated in the documents delivered to John's office yesterday is rather time-sensitive. One issue the documents raised is that some of John's clients in this case have waived all objections to my first round of interrogatories and their answers are overdue. Other documents included in the package delivered yesterday are a 2nd round of interrogatories to John's clients. I'll leave it to your and John's judgment as to how to handle those matters while John's on vacation.

Kind Regards,
Mike Bush

On June 24, 2022 at 9:28:01 AM, Barbara Fergusson (bfergusson@piercedavis.com) wrote:

Good morning Mr. Bush. Attorney Davis is on vacation and will not return until July 6, 2022. I will be sure he sees your emails upon his return. Thank you, and I hope you have a nice weekend.

Barbara

Sincerely,



Barbara Fergusson
Administrative Assistant to
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& Colleen Howard
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From: Mike Bush <bmoc54@verizon.net>
Sent: Friday, June 24, 2022 9:25 AM
To: John Davis <JDavis@piercedavis.com>
Cc: Barbara Fergusson <BFFergusson@piercedavis.com>
Subject: Typo in interrogatory | Bush v. Fantasia et al

Hi John,

I realized that there was a typographical error in one of the documents delivered to you yesterday. Interrogatory number 2 to the Town of Carlisle begins with "Did the Town of Carlisle and/or any of its entities / personnel declaration of emergency concerning SARS-CoV-2 and/or COVID-19?" It should instead be "Did the Town of Carlisle and/or any of its entities / personnel declare an emergency concerning SARS-CoV-2 and/or COVID-19?"

If you would please pass along that clarification, I would appreciate it.

Kind Regards,

Mike Bush